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Attorney for Plaintiff

**UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF CALIFORNIA**

Tiffani Rinzel,)	Case No. 1:22-cv-00143-AWI-GSA
Plaintiff,)	STIPULATION AND ORDER FOR
)	EXTENSION OF TIME
vs.)	
Kilolo Kijakazi, Acting)	
Commissioner of Social Security,)	
Defendant.)	

IT IS HEREBY STIPULATED, by and between the parties through their respective counsel of record, with the Court's approval, that Plaintiff shall have a 13-day extension of time, from September 21, 2022 to October 4, 2022, for Plaintiff to serve on defendant with Plaintiff's Motion for Summary Judgment. All other dates in the Court's Scheduling Order shall be extended accordingly.

This is Plaintiff's third request for an extension of time. Counsel for the Plaintiff returned the weekend of September 11, 2022 from Texas after being out several weeks attending to an emergency with her ill father. (see attached

1 declaration). As Counsel has just recently returned, additional time will be needed
2 to ensure the timely filing of many merit briefs that are already on multiple
3 extensions.

4 The weeks of September 19, 2022 and September 26, 2022, Counsel for the
5 Plaintiff has six merit briefs, and several EAJA Motions. Counsel requires this
6 short 13 day extension to allow her to brief the issues on this matter thoroughly for
7 the Court's consideration. Plaintiff makes this request in good faith with no
8 intention to further delay this matter. Defendant does not oppose the requested
9 extension. Counsel apologizes to the Defendant and Court for any inconvenience
10 this may cause.

11
12 Respectfully submitted,

13 Dated: September 21, 2022 PENA & BROMBERG, ATTORNEYS AT LAW
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15 By: /s/ Dolly M. Trompeter
16 DOLLY M. TROMPETER
17 Attorneys for Plaintiff
18

19 Dated: September 21, 2022 PHILLIP A. TALBERT
20 United States Attorney
21 PETER K. THOMPSON
22 Acting Regional Chief Counsel, Region IX
23 Social Security Administration
24

25 By: */s/ Ellinor R. Coder
26 Ellinor R. Coder
27 Special Assistant United States Attorney
28 Attorneys for Defendant
(*As authorized by email on September 16, 2022)

ORDER

Pursuant to stipulation,

IT IS SO ORDERED.

Dated: **September 23, 2022**

/s/ Gary S. Austin
UNITED STATES MAGISTRATE JUDGE